

EXHIBIT 2

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Re: *Brown, et al. v. Google LLC*, Case No. 4:20-cv-03664-YGR-SVK (N.D. Cal.); *Calhoun, et al. v. Google LLC*, Case No. 4:20-cv-05146-YGR-SVK (N.D. Cal.)

Dear Counsel,

We write in advance of our meet and confer regarding the [REDACTED] and Analytics mapping/linking tables that are the subject of Google's motion for relief in both *Brown* (Dkt. 782) and *Calhoun* (Dkt. 898). To ensure a productive and efficient meet and confer, we provide the following information to demonstrate "how the information in the tables that are the subject of the Motion is contained in or may be derived from other information that Google is preserving." *Brown* Dkt. 830 at 2; *Calhoun* Dkt. 960 at 3; *see also* 1/10/23 Brown Hrg. Tr. 30:1-6 (directing Google to "show both sides of the equation, which is here's the data in the tables that we don't think need to be preserved from the [REDACTED] tables, but here's how and where you find it in the material[.]"); *id.* 31:22-23 (requiring Google to show "this is the linking in the [REDACTED] tables at issue, and here's where you find it in what is already being preserved.").

Tables. As explained in the motion and at the hearing, all [REDACTED] tables contain Biscotti ID linkages derived from other tables that Google is separately preserving.

quinn emanuel urquhart & sullivan, llp

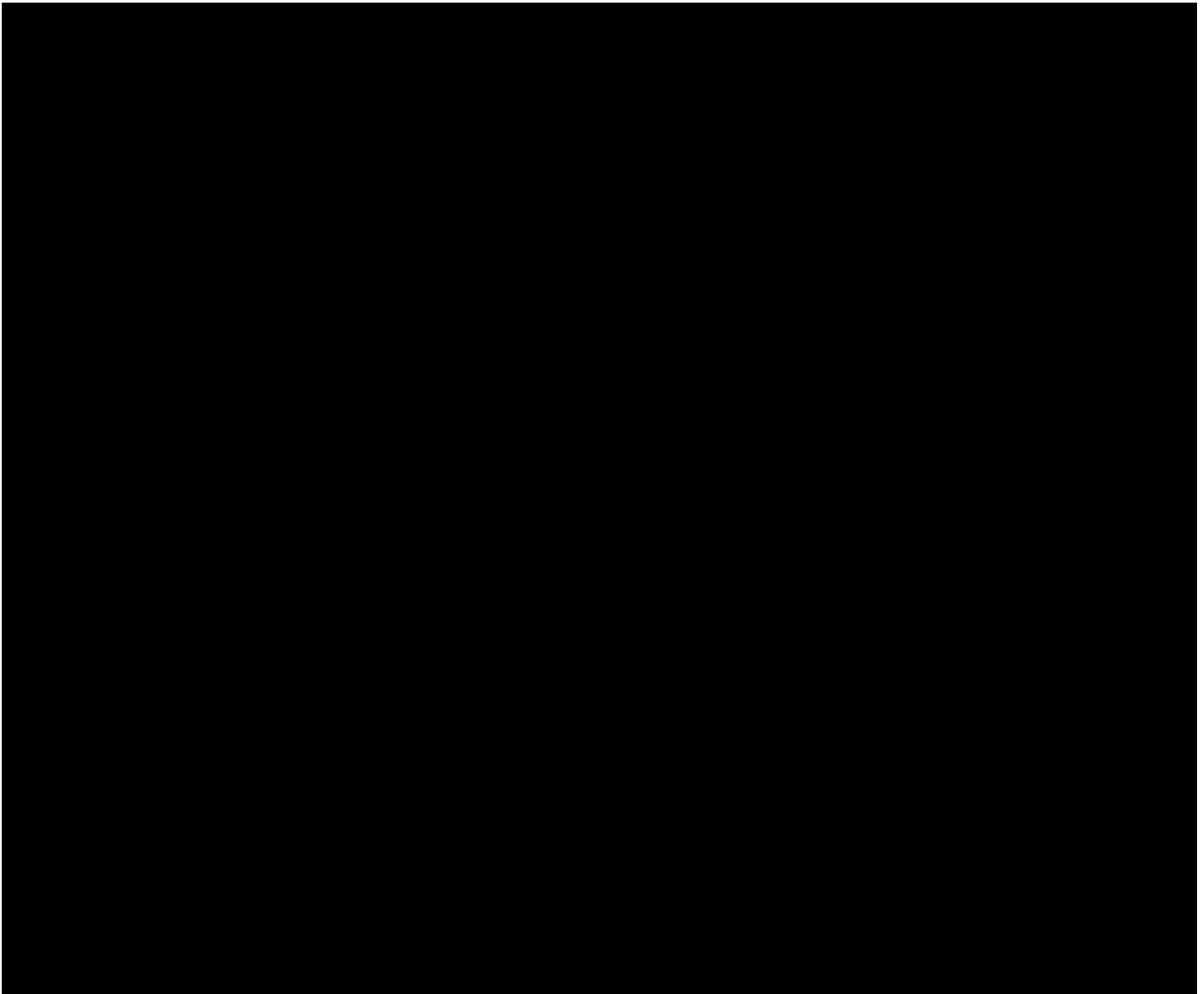
ATLANTA | AUSTIN | BOSTON | BRUSSELS | CHICAGO | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH

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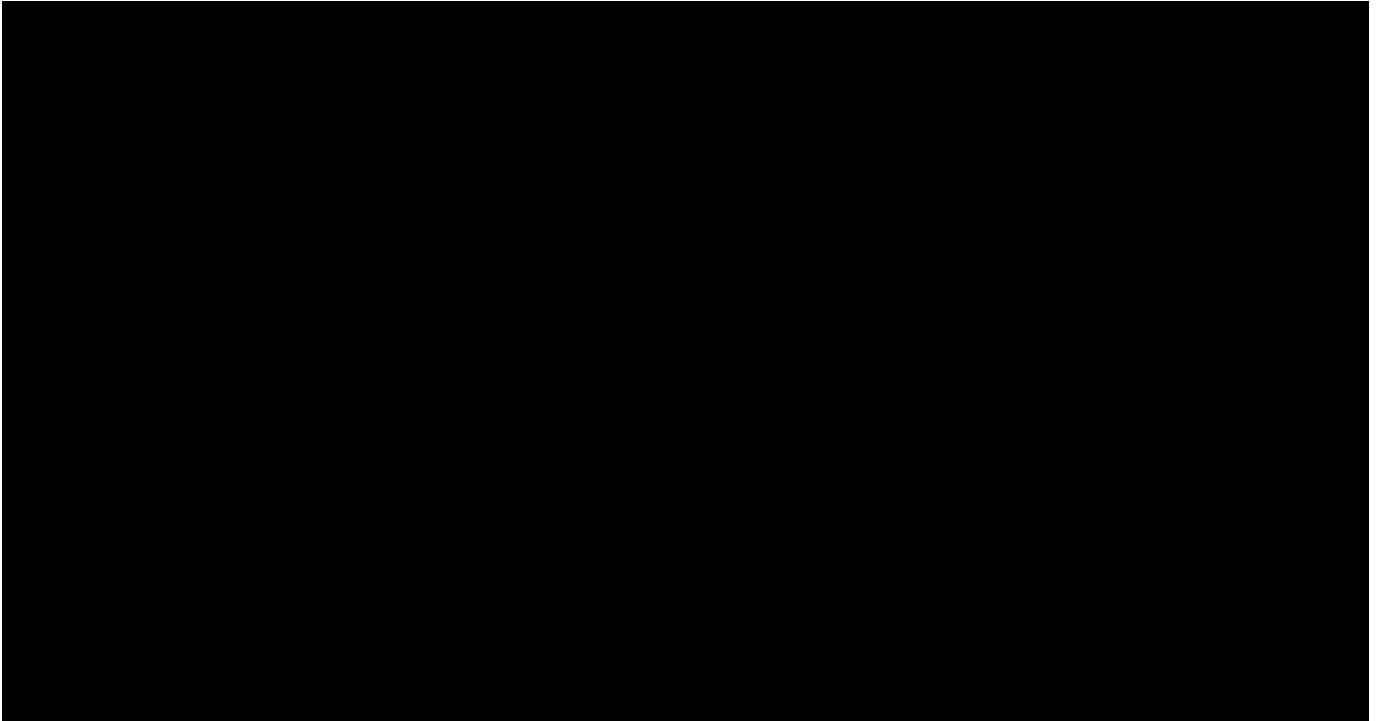
The [REDACTED] tables aim at different measurement and targeting use cases, and are stored in the following directories:

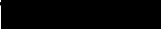

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

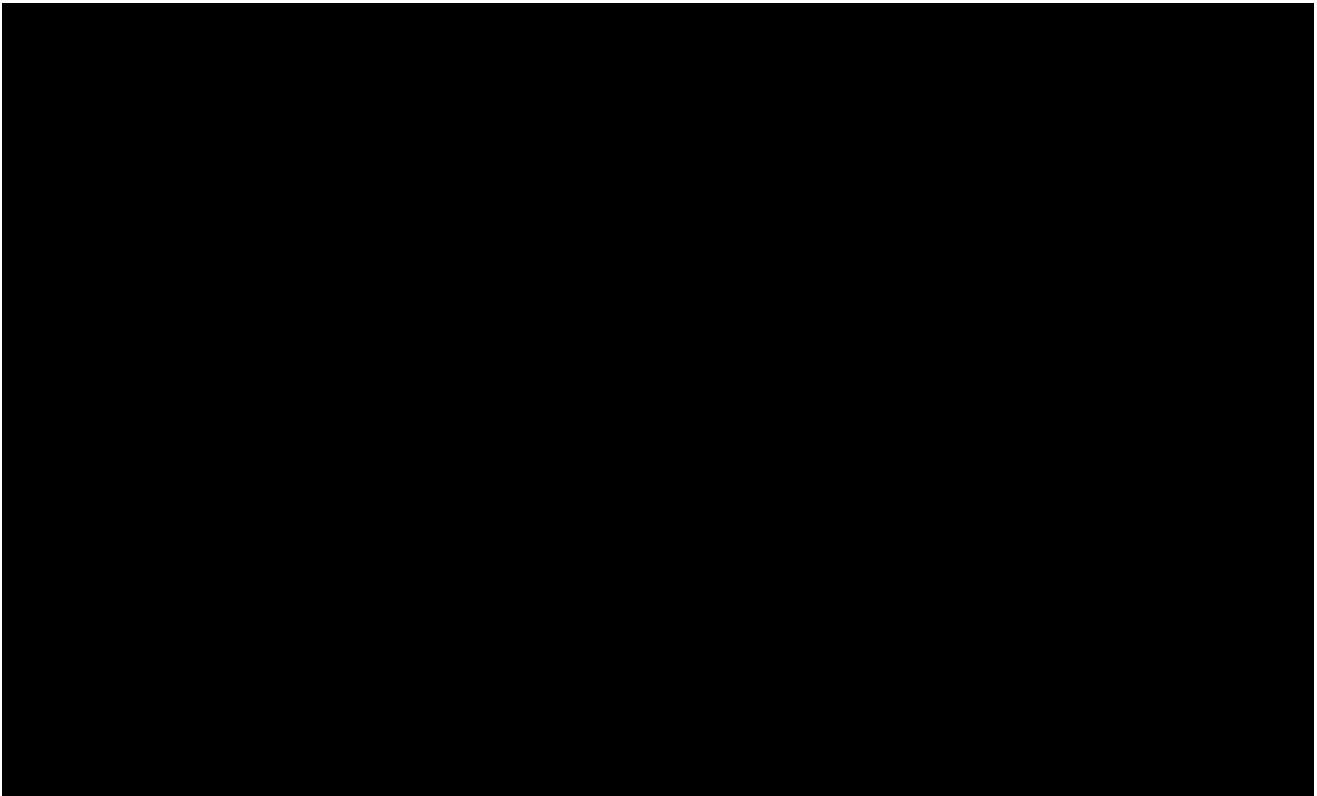
Below are sampled entries from [REDACTED]. The entries highlighted in blue represent linked Biscotti IDs that have been grouped together under a single [REDACTED] (“[REDACTED]”) and are identified as possibly belonging to the same user. *See Calhoun* Dkt. 942-5, Trebicka Ex. 1 (GOOG-CALH-00374314) at -353 (“[REDACTED] provides a single graph of Biscotti IDs where a link in the graph indicates the [REDACTED] Biscotti IDs belong to the same user”).



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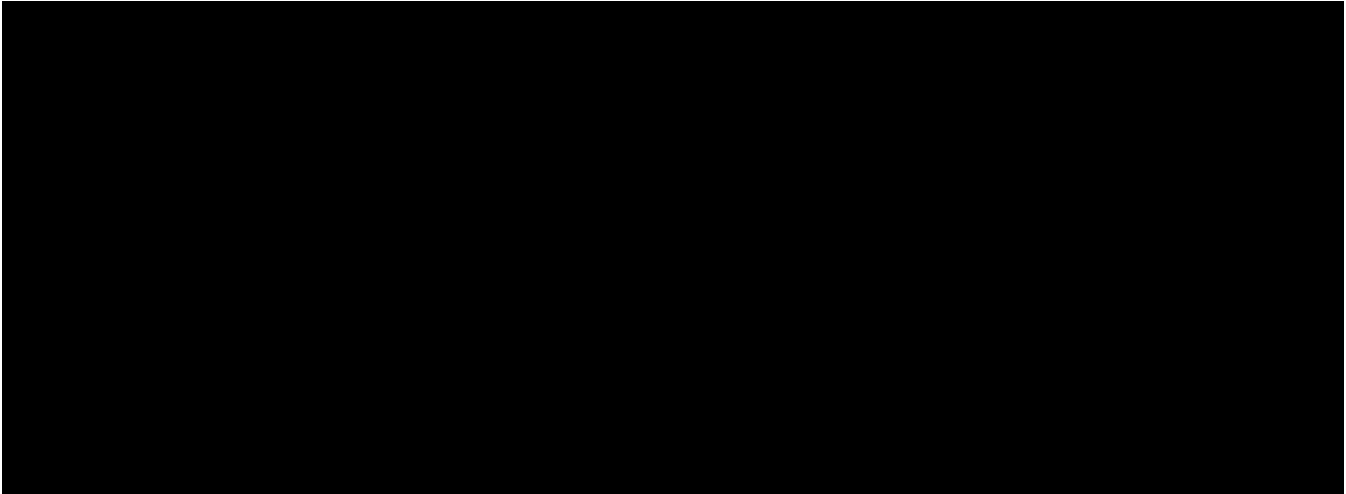


The entries highlighted in red (values in the “” field) represent the source tables from which the Biscotti linkages were derived. Below is the source code used to define the “” field as well as the corresponding comment:



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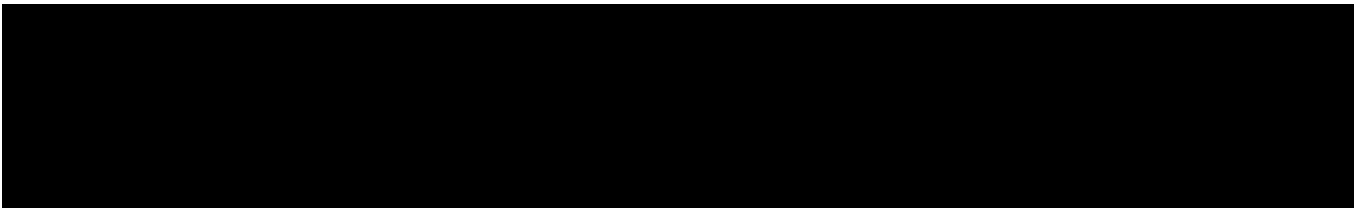
As the above field definition indicates, the Biscotti linkages contained in the [REDACTED] tables are derived from the following mapping/linking tables. Google is separately preserving all these tables.



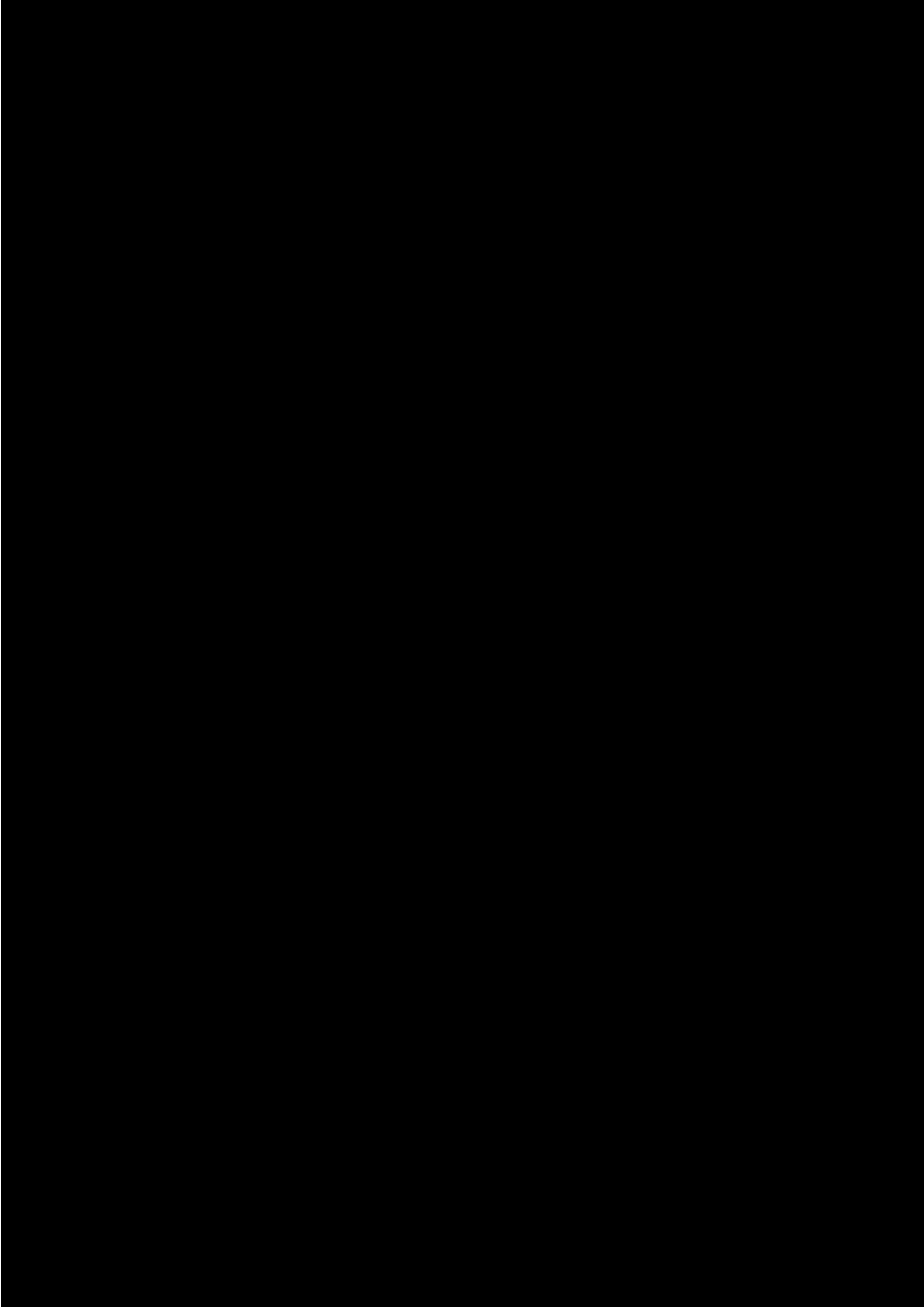
See id. at -354, -355.

Analytics Tables. As explained in the Declaration of Sree Pothana, the [REDACTED] Analytics tables—[REDACTED] and [REDACTED]—contain mappings between UID/CID to Biscotti or UID/CID to device ID. These tables do not include mapping to GAIA IDs. *Brown Dkt. 781-10 ¶ 5; Calhoun Dkt. 897-12 ¶ 5.* Google Analytics does not receive device IDs when users visit Google Analytics customer websites. *Id.*

Below are sampled mapping entries from the [REDACTED] table. The entry highlighted in yellow is an encoded string that represents a combination of IDs corresponding to each [REDACTED] client and CIDs; the entry highlighted in orange is an encoded string that represents a combination of IDs corresponding to each [REDACTED] client and UIDs. The “[REDACTED]” field (highlighted in green) contains Biscotti ID. As shown below, the [REDACTED] table maps CID/UID to Biscotti ID.

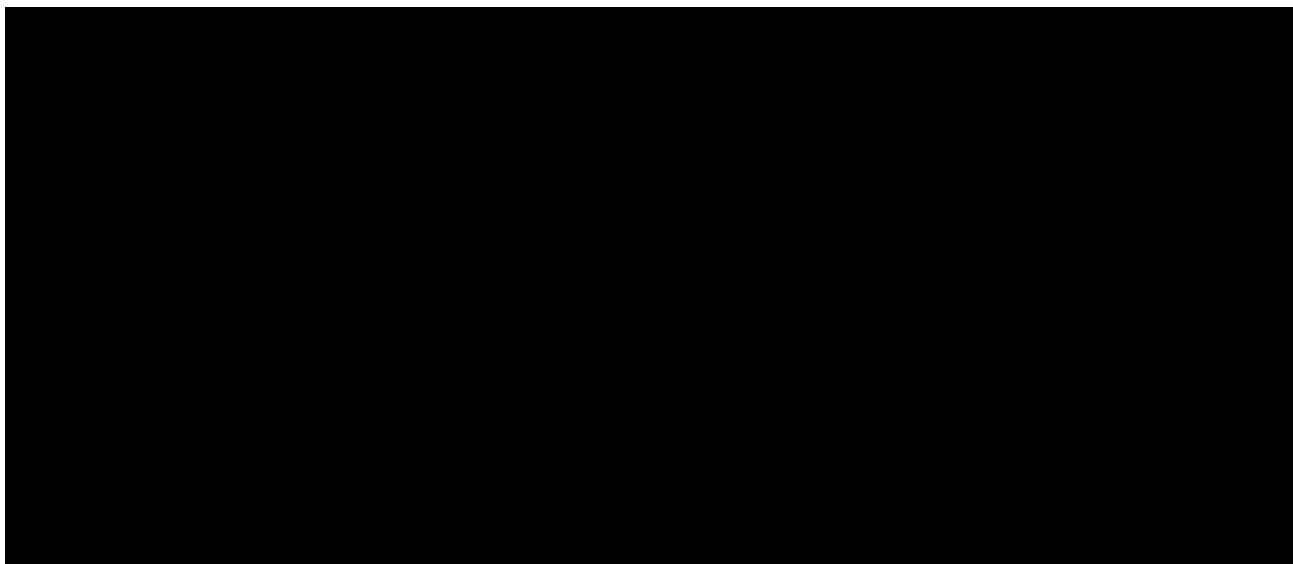


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Below are sampled mapping entries from the [REDACTED] table. The entries highlighted in orange are encoded strings that represent a combination of IDs corresponding to each [REDACTED] client and CIDs. The "[REDACTED]" field (highlighted in blue) contains Biscotti ID. As shown below, the visitor_history table maps CID to Biscotti ID.



The *Brown* Plaintiffs will not need these [REDACTED] mapping tables to read any of the preserved data because for a given sampled entry in the preserved Analytics logs ([REDACTED] [REDACTED] and [REDACTED]), any mapping of UID/CID to Biscotti will be self-contained within the sampled data. UID and CID values are populated in the "[REDACTED]" field and Biscotti values are populated in the "[REDACTED]" field.

The *Calhoun* Plaintiffs will likewise not need these tables to interpret any of the preserved data because: (1) the only data sources in the preservation order that relate to Google Analytics are in GAIA [REDACTED] or [REDACTED], which are all keyed to GAIA; and (2) as explained above, these [REDACTED] mapping tables include no mappings to GAIA.

* * *

We look forward to discussing this in more detail at the upcoming meet and confer.

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Sincerely,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

A handwritten signature in blue ink, appearing to read "Trebicka", with a long horizontal stroke extending to the left.

Viola Trebicka

VT